

STATE & FEDERAL CIVIL/CRIMINAL LITIGATION

Admitted to Practice: State of Florida U.S. District Court Southern District of Florida U.S. District Court Middle District of Florida U.S. District Court of Appeals, 11th Circuit

July 31, 2020

BY ECF AND BY EMAIL

The Honorable Richard M. Berman United States District Judge Southern District of New York 500 Pearl Street New York, NY 10007

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SO ORDERED:	21	4 45		
Date: 8/3/2020	Rucha	rel M.	Contract	
		Richard M. Berman, U.S.D.J.		

Re: United States v. CARLOS ECHEVARRIA; 18-cr-347-RMB

Dear Judge Berman,

The undersigned attorney writes in response to the Government's Response to Defendant Carlos Echevarria's Motion for Compassionate Release filed on July 20, 2020 (D.E. 68).

Miami FCI (Federal Correctional Institute) received the government's response on Monday, July 27th, 2020; however, the government's response was not provided to Mr. Echevarria until Thursday, July 30th, 2020. Using this date, Mr. Echevarria's Reply would be due by Monday, August 3rd, 2020. The undersigned attorney was recently hired by Mr. Echevarria's family to file a Reply to the Government's Response. As such, undersigned has not had the opportunity to review the file in its entirety and therefore, respectfully requests an additional seven days to file his Reply. Undersigned has conferred with Assistant United States Attorney, Elizabeth Hanft, who does not oppose the Reply being filed on or before Friday, August 7th, 2020.

For the reasons listed above, the undersigned attorney respectfully asks this Court to enter an Order granting an extension of time to file his Reply to Government's Response to Defendant's Motion for Compassionate Release.

Respectfully Submitted,

/s/ Frank Andrew Prieto FRANK A. PRIETO, ESQ. Fla. Bar: 514071